REMARKS

Claims 1- 14 and 16 - 24 are pending in this application with claims 1, 5-14 and 16-24 being amended by this response and new claims 25 and 26 added for consideration. Support for the amendments to the claims as well as new claims 25 and 26 may be found throughout the specification and drawing figures, and more specifically on pages 17 – 19 of the specification. Thus, it is respectfully submit that no new matter has been added by these amendments.

Objections to the Claims

Claims 11 and 19 are objected to for being duplicate claims. The claims are currently amended and are no longer duplicative. In view of the amendments to the claims, Applicant respectfully submits that this objection has been satisfied and should be withdrawn.

Rejection of Claims 1-3 and 9 under 35 U.S.C. 102(b)

Claims 1-3 and 9 are rejected under 35 U.S.C. 102(b) as being anticipated by Ito et al (U.S. Patent No. 5,939,088).

Amended claim 1 provides a floor mat laid in a small animal rearing cage for housing and rearing a small animal, the floor mat being a sheet having a flexibility to a degree that can wrap the body of the small animal and a size that covers at least the entire abdomen of the small animal, where the flexibility and size are such that the sheet is capable of being seamlessly folded onto itself, even after being laid down in a form where the sheet is randomly folded onto itself so as to form a fold large enough for the small animal to hide at least half of its body. The sheet is formed of an improved cellulose fabric comprising cellulose having carboxyl groups chemically bound thereto wherein the cellulose having carboxyl groups chemically bound thereto is formed in a shape of a sheet. For the reasons presented below, Applicant respectfully submits that Ito fails to disclose each feature claimed in amended claim 1.

Ito describes an animal sheet that "has permeability of the excreta, for example, urine of the animals and is a polymer-containing sheet 1 made from rayon and the like, the second sheet which is a synthetic resin film 4 having no fluid permeability, and the third sheet which is

sandwiched between the first sheet, namely polymer-containing sheet 1 and the second sheet, namely synthetic resin film 4 and which consists of one or more layers comprising paper 2 and polymer-containing sheets 3" (Ito, col. 3, lines 25-34). However, unlike the claimed invention, Ito fails to disclose or suggest that the "sheet is formed of an improved cellulose fabric comprising cellulose having **carboxyl groups chemically bound** thereto wherein the cellulose having carboxyl groups chemically bound thereto is formed in a shape of a sheet". The chemically bound carboxyl group of the claimed invention provides the sheet with a deodorizing property due during the chemical binding process. This is fundamentally different from Ito which merely mentions that the sheet is either impregnated with or painted with DL-pyrrolidone carboxylate. DL-pyrrolidone carboxylate is NOT equivalent to the chemically bound carboxyl group of the claimed arrangement because DL-pyrrolidone carboxylate is a carboxylic acid salt which does not have a deodorant function. Moreover, painting or impregnating the sheet with DL-pyrrolidone carboxylate as in Ito is NOT equivalent to the claimed arrangement wherein "sheet is formed of an improved cellulose fabric comprising cellulose having **carboxyl groups chemically bound** thereto". Chemically binding the carboxyl group as in the claimed arrangement provides an enhanced cellulose sheet wherein the bond between the carboxyl group is significantly stronger than the bond between DL-pyrrolidone carboxylate that is either painted on or impregnated in Ito. Specifically, in Ito, the DL-pyrrolidone carboxylate impregnated or painted on the sheet would be lost if the sheet was washed for reuse. Contrast this with the claimed arrangement whereby the carboxyl group is chemically bound to the cellulose thereby advantageously providing a floor mat that maintains the carboxyl group even after water or urine contacts the mat. Therefore, Applicant respectfully submits that Ito fails to disclose or suggest each feature of amended claim 1. Consequently, withdrawal of the rejection of claim 1 is respectfully requested.

Claims 2 and 3 are dependent on claim 1 and are considered patentable for the reasons presented above with respect to claim 1. Consequently, withdrawal of the rejection of claim 1 is respectfully requested.

Claim 9 has been amended to be dependent on amended claim 7 which depends from claim 2. Claim 9 is therefore considered patentable for the reasons presented above with respect

to claims 1 and 2. Claim 9 is also considered patentable because Ito fails to disclose or suggest that the "improved cellulose fabric contains 40 to 140 millimole carboxyl groups per 100 g of dry fabric". Specifically, as discussed above, Ito merely describes using an inferior and non-equivalent chemical (DL-pyrrolidone carboxylate) in a non-equivalent manner (either painting the chemical on a sheet or impregnating a sheet with the chemical). In contrast, the claimed arrangement provides for chemically bound carboxyl group in the amount ranging between "40 to 140 millimole carboxyl groups per 100 g of dry fabric". For example, in a composition that includes 100 millimole carboxyl group per 100 g of dry fabric (an intermediate value of the claimed range) provides a considerably high loading amount of carboxyl group on the cellulose fabric because the carboxyl groups are bound directly to the cellulose. Without chemically bonding the carboxyl to the cellulose as in the claimed arrangement and instead impregnating or painting DL-pyrrolidone carboxylate onto cellulose, the resulting sheet would have strong acidic odor and taste and could not be used in direct contact with pets or animals being reared. Thus, the claimed arrangement advantageously incorporates a significant load of carboxyl group by chemically bonding the carboxyl group to the cellulose to achieve the benefits associated therewith without the drawbacks of an overpowering acid taste and/or smell which may be detrimental to the animal when directly contacting the animal. Therefore, as Ito fails to contemplate the claimed range of carboxyl that is chemically bound to the cellulose, it is respectfully submitted that Ito does not anticipate the arrangement claimed in claim 9.

In view of the above remarks and amendments to the claims, Applicant respectfully submits that Ito fails to disclose each feature of claims 1 – 3 and 9. Consequently, withdrawal of the rejection under 35 USC 102(b) is respectfully requested.

Rejection of Claim 4 under 35 U.S.C. 103(a)

Claim 4 is rejected under 35 U.S.C. 103(a) as being unpatentable over Ito et al (U.S. Patent No. 5,939,088) in view of Newton (U.S. Patent Publication No. 2004/01603).

Claim 4 is dependent on claim 1 and is considered patentable for the reasons presented above with respect to claim 1. Specifically, Ito fails to disclose or suggest "sheet is formed of an improved cellulose fabric comprising cellulose having **carboxyl groups chemically bound**

thereto wherein the cellulose having carboxyl groups chemically bound thereto is formed in a shape of a sheet" as in the claimed arrangement. Additionally, Newton combined with Ito, fails to provide enabling disclosure that would render the claimed arrangement unpatentable.

Newton describes a multipurpose disposable contour sheet for protecting a pet bed mattress or grooming table from shed pet hair, water, soil and tear damage, the disposable contour sheet being formed of a single flat unfolded and unbroken substantially rectangular sheet of garment interfacing fabric resistant to soiling, snagging, running and tearing and tends to capture for "net" shed pet hair; and a strip of elastic tape attached along substantially the entirety of a peripheral edge of the fabric sheet, and thereby forming the fabric sheet into contour sheet sized to cover an upper and side surfaces of a pet bed mattress or grooming table and having an elasticized opening therein sized to admit the pet bed mattress or grooming table. Similarly to Ito, Newton fails to disclose or suggest the "sheet is formed of an improved cellulose fabric comprising cellulose having **carboxyl groups chemically bound** thereto wherein the cellulose having carboxyl groups chemically bound thereto is formed in a shape of a sheet" as in the claimed arrangement. Consequently, withdrawal of the rejection of claim 4 is respectfully requested.

Rejection of Claims 5-8 10-11, 13-14 and 16-20 under 35 U.S.C. 103(a)

Claims 5-8, 10-11, 13-14 and 16-20 are rejected under 35 U.S.C. 103(a) as being unpatentable over Ito et al (U.S. Patent No. 5,939,088) in view of Otsuji et al (U.S. Patent Publication No. 2001/0009142).

Amended claim 5 is dependent on claim 1 and is considered patentable for the reasons presented above with respect to claim 1. Claim 5 is also considered patentable because Ito (with Otsuji) fail to disclose or suggest a floor mat laid in an animal cage that is "formed of an improved cellulose fabric comprising cellulose having **carboxyl groups chemically bound** thereto wherein the cellulose having carboxyl groups chemically bound thereto is formed in a shape of a sheet" as in the claimed arrangement. Additionally, Ito (with Otsuji) fail to disclose or suggest that the "cellulose having carboxyl groups chemically bound thereto is formed with a

graft polymerization method" that facilitates the chemical bonding of the carboxyl groups. Ito is discussed above with respect to claim 1 and the remarks are incorporated herein by reference.

Unlike the claimed invention Otsuji, describes an absorbent mat having a flat shape and that is useful for treating pet excreta. The mat has an absorbing base material of at least one of plant fiber and pump, an antimicrobial surface active agent or a combination of a surface active agent and an antimicrobial agent, and at least one of a binder, a crosslinking agent, and water. Otsuji, similarly to Ito, fail to disclose or suggest chemically bound carboxyl group that "is formed with a graft polymerization method". Rather, Otsuji provides for incorporation of a carboxylic acid by mixing with the base materials. Mixing is not equivalent to chemically bonding a carboxyl group "that is formed with a graft polymerization method" as in the claimed arrangement.

Additionally, Otsuji is fundamentally different from the claimed arrangement because Otsuji is a mat that is laid in the draining board of an animal cage and is intended to absorb excreted material. The mat described by Otsuji includes cationic and anionic surface active agents (para. 0039) that, if placed in direct contact with an animal would be harmful thereto. Applicants assertions is supported by Figure 1 (and corresponding description thereof) of Otsuji which clearly shows that the pad that absorbs excretion is placed under a grating in the draining area and is intended to be separated from and not in direct contact with the animal itself. This is fundamentally different from the claimed arrangement which provides a mat that includes "a flexibility to a degree that can wrap the body of the small animal and a size that covers at least the entire abdomen of the small animal" and "even after being laid down in a form where the sheet is randomly folded onto itself so as to form a fold large enough for the small animal to hide at least half of its body". Thus, the claimed arrangement directly contacts the animals and thus, must not be harmful thereto. This is achieved by chemically binding the carboxyl group to the cellulose such that an increased load of carboxyl group may be included without any of the drawbacks associated with acidic taste and/or smells.

Applicant respectfully submits that it is improper to combine the draining mat of Otsuji with the sheet of Ito because the resulting combination would produce a sheet that is harmful

to the animals and thus, contrary to the purpose of both Ito and the claimed arrangement. Moreover, even if one were to combine the sheet of Ito with the mat of Otusji, the result would not produce the present claimed invention. Instead, the combination would produce a mat that includes surface active agents and a carboxyl acid salt or carboxylic acid that must be placed in a draining board of a cage so as not to contact the animal. Moreover, the carboxyl acid salt or carboxylic acid would be added via mixing, impregnation or painting resulting in a weak bond between the carboxylic salt (which has no deordorization properties in the acid form), the carboxylic acid and the mat. Thus, the combination would not produce floor mat "formed of an improved cellulose fabric comprising cellulose having carboxyl groups chemically bound thereto wherein the cellulose having carboxyl groups chemically bound thereto is formed in a shape of a sheet" that is not harmful to the animal when directly contacting the animal. Consequently, withdrawal of the rejection of claim 5 is respectfully requested.

Claim 6 is amended to depend from claim 2 and therefore is considered patentable for the reasons presented above with respect to claims 1 and 2. Claim 6 is also considered patentable because Otsuji adds nothing to Ito that discloses or suggests that the "improved cellulose fabric contains 40 to 140 millimole carboxyl groups per 100 g of dry fabric". Ito (with Otsuji) merely describes using an inferior and non-equivalent chemical (DL-pyrrolidone carboxylate or carboxylic acid) in a non-equivalent manner (either mixing with base materials, painting the chemical on a sheet or impregnating a sheet with the chemical). In contrast, the claimed arrangement provides for chemically bound carboxyl group in the amount ranging between "40 to 140 millimole carboxyl groups per 100 g of dry fabric". For example, in a composition that includes 100 millimole carboxyl group per 100 g of dry fabric (an intermediate value of the claimed range) provides a considerably high loading amount of carboxyl group on the cellulose fabric because the carboxyl groups are bound directly to the cellulose. Without chemically bonding the carboxyl to the cellulose as in the claimed arrangement and instead impregnating or painting or mixing the DL-pyrrolidone carboxylate or carboxylic acid onto cellulose as in Ito (with Otsuji), the resulting sheet would have strong acidic odor and taste and could not be used in direct contact with pets or animals being reared.

Thus, the claimed arrangement advantageously incorporates a significant load of carboxyl group by chemically bonding them to the cellulose to achieve the benefits associated therewith without the drawbacks of an overpowering acid taste and/or smell. Therefore, as Ito (with Otsuji) fails to contemplate the claimed range of carboxyl that is chemically bound to the cellulose, it is respectfully submitted that the claimed arrangement is not made unpatentable by Ito (with Otsuji).

Claim 7 is amended to be dependent on claim 2 and therefore is considered patentable for the reasons presented above with respect to claims 1 and 2. Consequently, withdrawal of the rejection of claim 7 is respectfully requested.

Claim 8 is amended to be dependent on claim 2 and therefore is considered patentable for the reasons presented above with respect to claims 1 and 2. Claim 8 is further considered patentable for the reasons presented with respect to claim 5. Specifically, Otsuji alone or in combination with Ito fail to disclose or suggest "the cellulose having carboxyl groups chemically bound thereto is formed with a graft polymerization method". No such method is disclosed or suggested. In fact Otsuji (with Ito) merely disclose impregnating, mixing or painting a sheet with chemicals and neither disclose nor suggest chemical bonding by graft polymerization as in the claimed arrangement. Consequently, withdrawal of the rejection of claim 8 is respectfully requested.

Claim 10 is amended to be in independent form and includes the features of previously presented claim 6 along with the additional features claimed therein. Therefore, the rejection of independent claim 6 will be discussed hereinbelow with respect to amended independent claim 10.

Amended independent claim 10 provides a "small animal rearing cage for housing and rearing a small animal, said small animal rearing cage comprising a rearing box having a floor and a wall provided at a circumference of the floor; and a floor mat formed with a sheet having a flexibility to a degree that can wrap the body of the small animal and a size that covers at least

the entire abdomen of the small animal, where the flexibility and size are such that the sheet is capable of being seamlessly folded onto itself, even after being laid down in a form where the sheet is randomly folded onto itself so as to form a fold large enough for the small animal to hide at least half of its body, wherein the sheet is formed of an improved cellulose fabric comprising cellulose having carboxyl groups chemically bound thereto, wherein the cellulose having carboxyl groups chemically bound thereto is formed in the shape of a sheet".

Amended independent claim 10 is considered patentable for the reasons presented above with respect to claim 1. Claim 10 is further considered patentable because Ito (with Otsuji) neither disclose nor suggest a floor mat "formed of an improved cellulose fabric comprising cellulose having **carboxyl groups chemically bound** thereto wherein the cellulose having carboxyl groups chemically bound thereto is formed in a shape of a sheet" as in the claimed arrangement. Ito is discussed above with respect to claim 1 and the remarks are incorporated herein by reference. Otsuji, similarly to Ito, provides for the inclusion of a non-equivalent chemical, carboxylic acid, that is added in a non-equivalent manner. In Otsuji, the carboxylic acid is added by mixing with base materials such as cellulose. This does NOT produce a cellulose having carboxyl groups chemically bound thereto as in the claimed arrangement.

Moreover, Otsuji is fundamentally different from the claimed arrangement because Otsuji is a mat that is laid in the draining board of an animal cage and is intended to absorb excreted material. The mat described by Otsuji includes cationic and anionic surface active agents (para. 0039) that, if placed in direct contact with an animal would be harmful thereto. Applicants assertions is supported by Figure 1 (and corresponding description thereof) of Otsuji which clearly shows that the pad that absorbs excretion is placed under a grating in the draining area and is intended to be separated from and not in direct contact with the animal itself. This is fundamentally different from the claimed arrangement which provides a mat that includes "a flexibility to a degree that can wrap the body of the small animal and a size that covers at least the entire abdomen of the small animal" and "even after being laid down in a form where the sheet is randomly folded onto itself so as to form a fold large enough for the small animal to hide at least half of its body". Thus, the claimed arrangement directly contacts the animals and thus, must not be harmful thereto. This is achieved by chemically binding the carboxyl group to the

cellulose such that an increased load of carboxyl group may be included without any of the drawbacks associated with acidic taste and/or smells.

Applicant respectfully submits that it is improper to combine the draining mat of Otsuji with the sheet of Ito because the resulting combination would produce a sheet that is harmful to the animals and thus, contrary to the purpose of both Ito (and the claimed arrangement). Moreover, even if one were to combine the sheet of Ito with the mat of Otusji, the result would not produce the present claimed invention. Instead, the combination would produce a mat that includes surface active agents and a carboxyl acid salt and/or carboxylic acid that must be placed in a draining board of a cage so as not to contact the animal. Moreover, the carboxyl acid salt or carboxylic acid would be added via mixing, impregnation or painting resulting in a weak bond between the carboxyl acid salt (which has no deodorization properties in the acid form) or carboxylic acid and the mat. Thus, the combination would not produce floor mat "formed of an improved cellulose fabric comprising cellulose having carboxyl groups chemically bound thereto wherein the cellulose having carboxyl groups chemically bound thereto is formed in a shape of a sheet" that is not harmful to the animal when directly contacting the animal. Consequently, withdrawal of the rejection of claim 10 is respectfully requested.

Amended claim 11 is dependent on claim 10 and is considered patentable for the reasons presented above with respect to claims 1 and 10. Consequently, withdrawal of the rejection of claim 10 is respectfully requested.

Amended claim 13 is dependent on claim 10 and is considered patentable for the reasons presented above with respect to claims 1 and 10. Claim 13 is also considered patentable because Otsuji (with Ito) fail to disclose or suggest chemically bound carboxyl groups wherein "the improved cellulose fabric contains 40 to 140 millimole carboxyl group per 100 grams of dry fabric". As discussed above with respect to claim 6, the amount of carboxyl group claimed in claim 13 is not possible in either Ito or Otsuji. Specifically, incorporating carboxyl group in the claimed range in any of the manners described by Ito or Otsuji would produce a sheet or mat that has a highly acidic odor and taste which is detrimental to the animals. In contrast, the claimed arrangement, by providing for chemically bound carboxyl groups in cellulose advantageously

produces a floor mat for use in an animal rearing cage that includes a high load of carboxyl without any of the associated drawbacks. Moreover, the chemical binding of the carboxyl groups enables re-use of the mat because the carboxyl groups are not washed off in the presence of water or urine. Ito alone or in combination with Otsuji fail to disclose or suggest equivalent features. Consequently, withdrawal of the rejection of claim 13 is respectfully requested.

Claim 14 is dependent on claim 10 and is considered patentable for the reasons presented above with respect to claims 1 and 10. Claim 14 is further considered patentable for the reasons presented above with respect to claim 5. Consequently, withdrawal of the rejection of claim 14 is respectfully requested.

Claim 16 is dependent on claim 11 and is considered patentable for the reasons presented above with respect to claims 1, 10 and 11. Consequently, withdrawal of the rejection of claim 16 is respectfully requested.

Claim 17 is dependent on claim 11 and is considered patentable for the reasons presented above with respect to claims 1, 10 and 11. Claim 17 is further considered patentable for the reasons presented above with respect to claim 5. Consequently, withdrawal of the rejection of claim 17 is respectfully requested.

Claim 18 is dependent on claim 16 and is considered patentable for the reasons presented above with respect to claims 1, 10, 11 and 16. Claim 18 is further considered patentable for the reasons presented above with respect to claims 6 and 13. Consequently, withdrawal of the rejection of claim 18 is respectfully requested.

Claim 19 is dependent on claim 10 and is considered patentable for the reasons presented above with respect to claims 1 and 10. Consequently, withdrawal of the rejection of claim 19 is respectfully requested.

Claim 20 is amended to be in independent form and therefore, the rejection of claim 20 is considered moot. However, amended independent claim 20 provides a floor mat laid in a small

animal rearing cage for housing and rearing a small animal. The floor mat is a sheet wherein the sheet is formed of an improved cellulose fabric comprising cellulose having carboxyl groups chemically bound thereto, wherein the cellulose carboxyl groups chemically bound thereto is formed in a shape of a sheet. Applicant respectfully submits that claim 20 is considered patentable for the reasons presented above with respect to claims 1 and 10. Consequently, withdrawal of the rejection of claim 20 is respectfully requested.

In view of the above remarks and amendments to the claims Applicant respectfully submits that Ito when taken alone or in combination with Otsuji fails to disclose or suggest the features of claims 5-8, 10-11, 13-14 and 16-20. Consequently, withdrawal of the rejection under 35 USC 103(a) is respectfully requested.

Rejection of Claim 12 under 35 U.S.C. 103(a)

Claim 12 is rejected under 35 U.S.C. 103(a) as being unpatentable over Ito et al (U.S. Patent No. 5,939,088) as modified by Otsuji et al. U.S. Patent Publication No. 2001/0009142) in further view of Newton (U.S. Patent Publication No. 2004/01603).

Claim 12 is dependent on claim 10 and is considered patentable for the reasons presented above with respect to claims 1 and 10. Specifically, Ito (with Otsuji) fails to disclose or suggest a "sheet is formed of an improved cellulose fabric comprising cellulose having **carboxyl groups chemically bound** thereto wherein the cellulose having carboxyl groups chemically bound thereto is formed in a shape of a sheet" as in the claimed arrangement. Additionally, Newton combined with Ito and/or Otsuji, fails to provide enabling disclosure that would render the claimed arrangement unpatentable.

Newton describes a multipurpose disposable contour sheet for protecting a pet bed mattress or grooming table from shed pet hair, water, soil and tear damage, the disposable contour sheet being formed of a single flat unfolded and unbroken substantially rectangular sheet of garment interfacing fabric resistant to soiling, snagging, running and tearing and tends to capture for "net" shed pet hair; and a strip of elastic tape attached along substantially the entirety of a peripheral edge of the fabric sheet, and thereby forming the fabric sheet into contour sheet

sized to cover an upper and side surfaces of a pet bed mattress or grooming table and having an elasticized opening therein sized to admit the pet bed mattress or grooming table. Similarly to Ito and Otsuji, Newton fails to disclose or suggest the "sheet is formed of an improved cellulose fabric comprising cellulose having **carboxyl groups chemically bound** thereto wherein the cellulose having carboxyl groups chemically bound thereto is formed in a shape of a sheet" as in the claimed arrangement. Consequently, withdrawal of the rejection of claim 12 is respectfully requested.

Rejection of Claims 21-24 under 35 U.S.C. 103(a)

Claims 21-24 are rejected under 35 U.S.C. 103(a) as being unpatentable over Otsuji et al. (U.S. Patent Publication No. 2001/0009142).

Amended claim 21 is dependent on claim 20 and is considered patentable for the reasons presented above with respect to claims 1, 10 and 20. Specifically, Otsuji fails to disclose or suggest a "floor mat being a sheet wherein the sheet is formed of an improved cellulose fabric comprising cellulose having carboxyl groups chemically bound thereto, wherein the cellulose carboxyl groups chemically bound thereto is formed in a shape of a sheet" as in the claimed arrangement. Otsuji merely discloses mixing a carboxylic acid with base materials. This is fundamentally different from and not equivalent to a sheet that has carboxyl groups chemically bound to cellulose.

Additionally, claim 21 is considered patentable because Otsuji fails to disclose or suggest that the "improved cellulose fabric contains 40 to 140 millimole carboxyl groups per 100 g of dry fabric". Instead, Otsuji merely describes using an inferior and non-equivalent chemical (carboxylic acid) in a non-equivalent manner (mixing with base materials). In contrast, the claimed arrangement provides for chemically bound carboxyl group in the amount ranging between "40 to 140 millimole carboxyl groups per 100 g of dry fabric". For example, in a composition that includes 100 millimole carboxyl group per 100 g of dry fabric (an intermediate value of the claimed range) provides a considerably high loading amount of carboxyl group on the cellulose fabric because the carboxyl groups are bound directly to the

cellulose. Without chemically bonding the carboxyl to the cellulose as in the claimed arrangement and instead mixing carboxylic acid as in Otsuji, the resulting sheet would have strong acidic odor and taste and could not be used in direct contact with pets or animals being reared. Thus, the claimed arrangement advantageously incorporates a significant load of carboxyl group by chemically bonding them to the cellulose to achieve the benefits associated therewith without the drawbacks of an overpowering acid taste and/or smell. Therefore, as Otsuji fails to contemplate the claimed range of carboxyl that is chemically bound to the cellulose, it is respectfully submitted that the claimed arrangement is not made unpatentable by Otsuji.

Claim 22 is amended to be in independent form and therefore, the rejection of claim 22 is considered moot. However, amended independent claim 22 provides a small animal rearing cage for housing a small animal including a rearing box having a floor and a wall provided at a circumference of the floor and a floor mat. The floor mat is laid in a small animal rearing cage for housing and rearing a small animal. The floor mat is a sheet wherein the sheet is formed of an improved cellulose fabric comprising cellulose having carboxyl groups chemically bound thereto, wherein the cellulose carboxyl groups chemically bound thereto is formed in a shape of a sheet. Applicant respectfully submits that claim 22 is considered patentable for the reasons presented above with respect to claims 1 and 10. Consequently, withdrawal of the rejection of claim 22 is respectfully requested.

Amended claim 23 is dependent on claim 22 and is considered patentable for the reasons presented above with respect to claims 1, 10 and 22. Claim 23 is also considered patentable for the reasons presented above with respect to claim 21. Consequently, withdrawal of the rejection of claim 23 is respectfully requested.

Amended claim 24 is dependent on claim 20 and is considered patentable for the reasons presented above with respect to claims 1, 10 and 20. Claim 24 is further considered patentable because Otsuji fails to disclose or suggest that the "cellulose having carboxyl groups chemically bound thereto is formed with a graft polymerization method" that facilitates the chemical bonding of the carboxyl groups. Unlike the claimed invention Otsuji, describes an absorbent mat

having a flat shape and that is useful for treating pet excreta. The mat has an absorbing base material of at least one of plant fiber and pump, an antimicrobial surface active agent or a combination of a surface active agent and an antimicrobial agent, and at least one of a binder, a crosslinking agent, and water. Otsuji, fails to disclose or suggest chemically bound carboxyl group that "is formed with a graft polymerization method". Rather, Otsuji provides for incorporation of a carboxylic acid by mixing with the base materials. Mixing is not equivalent to chemically bonding a carboxyl group "that is formed with a graft polymerization method" as in the claimed arrangement. Consequently withdrawal of the rejection of claim 24 is respectfully requested.

In view of the above remarks and amendments to the claims Applicant respectfully submits that Otsuji fails to disclose or suggest the features of claims 21-24. Consequently, withdrawal of the rejection under 35 USC 103(a) is respectfully requested.

New Claims 25 and 26

Claim 25 is dependent on claim 22 and is considered patentable for the reasons presented above with respect to claim 22. Claim 25 is further considered patentable because Ito, Otsuji and/or Newton, alone or in any combination, fail to disclose or suggest that "the cellulose having carboxyl groups chemically bound thereto is formed with a graft polymerization method". Consequently, Applicant respectfully submits that Ito, Otsuji and/or Newton do not disturb the patentability of newly added claim 25.

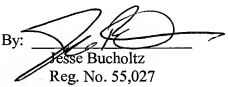
Claim 26 is dependent on claim 10 and is considered patentable for the reasons presented above with respect to claim 10. Consequently, Applicant respectfully submits that Ito, Otsuji and/or Newton do not disturb the patentability of newly added claim 25.

Having fully addressed the Examiner's rejections, it is believed that, in view of the preceding amendments and remarks, this application stands in condition for allowance. Accordingly then, reconsideration and allowance are respectfully solicited. If, however, the Examiner is of the opinion that such action cannot be taken, the Examiner is invited to contact

the Applicant's attorney at the phone number below, so that a mutually convenient date and time for a telephonic interview may be scheduled.

No additional e is believed due. However, if a fee is due, please charge the additional fee to Deposit Account 50-2828.

Respectfully submitted,
Takamasa Iwaki.

By: 
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